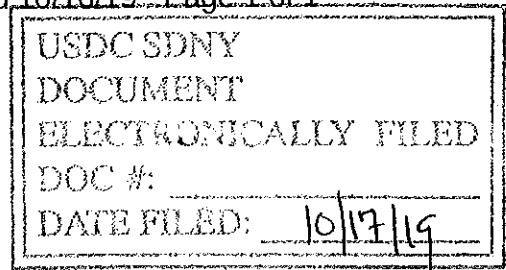


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October 16, 2019

Honorable Denise L. Cote
United States District Court
500 Pearl Street
New York, NY 10007

MEMO ENDORSE

Re: Securities and Exchange Commission v. Lek Securities Corp., et al.
Case No. 17 CV 1789 (DLC)

Your Honor:

I write to object to the Plaintiff's proposed demonstrative "Laguilles Slides" (attached hereto). Mr. Laguilles is an SEC employee. Mr. Laguilles is not a fact witness of the underlying conduct, but rather an authenticating witness whom the SEC intends to have testify that certain documents were not produced by the Defendants in response to SEC's requests for documents during the investigation that preceded the filing of the Complaint in this action. The Defendants have offered to stipulate to those facts, but the SEC has declined that offer.

The SEC's proposed demonstrative, which is attached, is an attempt by the SEC to use an SEC employee with no first-hand knowledge to introduce emails that the SEC considers damaging to the defense. The SEC has prepared slides that take portions of the emails out of context to be introduced by a witness that cannot be cross examined on the substance in an blatant effort to prejudice the jury. The Court should not allow to SEC to do so. These documents and the substance therein will come in through the witnesses who authored them and who can provide context about the meaning and intent of the language showcased inappropriately in the SEC's proposed demonstratives.

Denise L. Cote
Denise Cote
10/17/19

Respectfully submitted,

J. M. Wines

James Wines